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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91212783
Party	Defendant Future World Electronics, L.L.C.
Correspondence Address	RAYMOND G. AREAUX (#33,643) CARVER, DARDEN, KORETZKY, TESSIER, FINN, 1100 POYDRAS ST STE 3100 NEW ORLEANS, LA 70163-1102 UNITED STATES areaux@carverdarden.com
Submission	Answer
Filer's Name	Raymond G. Areaux (#33,643)
Filer's e-mail	areaux@carverdarden.com
Signature	/Theodore S. Owers III/
Date	12/11/2013
Attachments	Applicant's Answer and Affirmative Defenses.pdf(16414 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

Hasbro, Inc.
Opposer

v.

Future World Electronics, LLC
Applicant

* Opposition No. 91212783
*
* Serial No. 85/732,284
*
* Mark: MONEYOPOLY
*
*

APPLICANT’S ANSWER AND AFFIRMATIVE DEFENSES

Applicant, Future World Electronics, LLC, through its undersigned counsel of record, hereby respectfully files this Answer and Affirmative Defenses to the Notice of Opposition filed by Opposer, Hasbro, Inc. In response to the numbered paragraphs of the Notice of Opposition, Applicant states as follows:

1. Applicant admits the allegations set forth in Paragraph 1 of the Notice of Opposition.
2. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 2 of the Notice of Opposition and therefore denies the same.
3. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 3 of the Notice of Opposition and therefore denies the same.
4. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 4 of the Notice of Opposition and therefore denies the same.

5. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 5 of the Notice of Opposition and therefore denies the same.

6. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 6 of the Notice of Opposition and therefore denies the same.

7. Applicant lacks knowledge or information sufficient to form a belief as to the truth of the allegations set forth in Paragraph 7 of the Notice of Opposition and therefore denies the same.

8. Applicant denies the allegations set forth in Paragraph 8 of the Notice of Opposition and demands strict proof thereof.

9. Applicant denies the allegations set forth in Paragraph 9 of the Notice of Opposition and demands strict proof thereof.

10. Applicant denies the allegations set forth in Paragraph 10 of the Notice of Opposition and demands strict proof thereof.

11. Applicant denies the allegations set forth in Paragraph 11 of the Notice of Opposition and demands strict proof thereof.

12. Applicant denies the allegations set forth in Paragraph 12 of the Notice of Opposition and demands strict proof thereof.

13. As to the allegations set forth in Paragraph 13 of the Notice of Opposition, Applicant admits that registration of its MONEYOPOLY trademark would constitute prima facie evidence of the validity of such registration, of Applicant's ownership of the registered mark, and of Applicant's exclusive right to use the registered mark pursuant to the provisions of

15 U.S.C. §1057(b). Applicant denies the remaining allegations set forth in Paragraph 13 of the Notice of Opposition and demands strict proof thereof.

14. Applicant denies the allegations set forth in Paragraph 14 of the Notice of Opposition and demands strict proof thereof.

15. Applicant further denies any allegations in the Notice of Opposition not specifically admitted herein.

Affirmative Defenses

16. Opposer's claims are barred on the grounds that, on information and belief, Opposer has failed to police usage of the term MONOPOLY and similar terms by others.

17. Opposer's claims are barred on the grounds that the respective marks are not confusingly similar and the respective goods are noncompetitive and unrelated.

18. Opposer's dilution claim is barred on the grounds that the term MONOPOLY is not a famous mark as defined by 15 U.S.C. §1125(c)(2)(A).

WHEREFORE, in view of the foregoing, Applicant, Future World Electronics, LLC, prays that this Opposition No. 91212783 be dismissed with prejudice and that Applicant's application Serial No. 85/732,284 be approved for issuance of the Notice of Allowance.

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To the extent any fees are required to file or process these documents, the Commissioner is hereby authorized to charge any and all fees which may be required, or credit any overpayment to, Deposit Account No. 03-0937.

Respectfully submitted,

/Theodore S. Owers III/

RAYMOND G. AREAUX (Reg. #33,643)

THEODORE (TODD) S. OWERS III

J. MATTHEW MILLER III (Reg. #66,178)

Carver, Darden, Koretzky, Tessier,

Finn, Blossman & Areaux, L.L.C.

1100 Poydras Street, Suite 3100

New Orleans, Louisiana 70163

Telephone: 504-585-3803

Facsimile: 504-585-3801

E-mail: areaux@carverdarden.com

Attorneys for Applicant

CERTIFICATE OF SERVICE

I hereby certify that a true and complete copy of the foregoing Applicant's Answer and Affirmative Defenses has been served on Applicant by mailing said copy on December 11, 2013 via first-class mail to Opposer's counsel as follows:

Kim J. Landsman, Esq

Beth E. Nagalski, Esq.

Golenbock Eiseman Assor Bell & Peskoe LLP

437 Madison Avenue

New York, New York 10022

/Theodore S. Owers III/

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